UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

TER	EK RAHEEM DOWNING,)
	Plaintiff,	C.A. No. 05-568 (SLR)
v.		JURY OF TWELVE DEMANDED
ART	DAVIS, et al.,	
	Defendants.))
TO:	Terek Raheem Downing S.B.I.# 292285 Delaware Correctional Center 1181 Paddock Rd. Smyrna, DE 19977	Delaware Correctional Center 1181 Paddock Rd. Smyrna, DE 19977 % Correctional Medical Services 1201 College Park Drive, Ste 101 Dover, DE 19904

Department of Justice 820 N. French Street, 8th Floor Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned will take the deposition *duces tecum* of the Records Custodian for Delaware Correctional Center relating to medical records of Terek Raheem Downing at the offices of McCullough & McKenty, P.A., 1225 N. King Street, Suite 1100, Wilmington, Delaware 19801, on Tuesday, August 22, 2006 beginning at 2:00 p.m.: Note: Personal appearance is waived if the materials are received in our office prior to the date of deposition.

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo
Daniel L. McKenty, Del. Bar No. 2689
Dana Spring Monzo, Del. Bar No. 4605
1225 N. King Street, Suite 1100
P.O. Box 397
Wilmington, DE 19899-0397
(302) 655-6749
Attorneys for Defendant First Correctional Medical, LLC

Dated: August 8, 2006

UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

TEREK RAHEEM DOWNING,)
Plaintiff,) C.A. No. 05-568 (SLR)
v.) JURY OF TWELVE DEMANDED
ART DAVIS, et al.,)
Defendants.)

CERTIFICATE OF SERVICE

I, DANA SPRING MONZO, hereby certify that on the 8th day of August, 2006, two

(2) copies of the attached *Notice of Records Deposition* were sent to the following via first class mail, postage pre-paid:

TO: Terek Raheem Downing S.B.I.# 292285 **Delaware Correctional Center** 1181 Paddock Rd. Smyrna, DE 19977

Delaware Correctional Center 1181 Paddock Rd. Smyrna, DE 19977 % Correctional Medical Services 1201 College Park Drive, Ste 101 Dover, DE 19904

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/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689 Dana Spring Monzo, Del. Bar No. 4605 1225 N. King Street, Suite 1100 P.O. Box 397 Wilmington, DE 19899-0397 (302) 655-6749

Attorneys for Defendant First Correctional Medical, LLC